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Date: Thu, 17 Apr 1997 18:35:36 +0100

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<fontfamily><param>Times</param><bigger><bigger>I have just finished reading the proposed Cal Fed approach for addressing contaminants in the Sacramento and San Joaquin Rivers and the San Francisco Estuary system, and I felt compelled to voice my concerns, and to try to help put remediation of contaminant-related problems on the right track.

My perception of the Cal-Fed approach is that funding is being directed towards remediation without any actual understanding of whether or not the specific contaminants being addressed are in fact causing adverse effects on important fish (or invertebrate) populations in these waters. My apologies for the cliché, but I feel very strongly that this is putting the cart before the horse, and as a result, that Cal Fed is at risk of wasting money by taking actions where none may be needed and by not taking actions where the need may be great.

The issue of whether or not contaminants are adversely affecting important organisms in these waters is exactly the question our IEP Contaminants group has been wrestling with for almost a year now. The fact that we have been willing to spend this much time on this question is testament to how important we feel the answers will be to ultimately eliminating contaminant-related problems. In short, we must know what

the problems really are before we can fix them!

Over the past year of collectively thinking about this issue, the IEP Contaminants group has developed several proposed studies to investigate and document problem areas which we feel merit immediate attention. In the area of the "likely" problem of organophosphate pesticide toxicity, we have developed a proposed study to determine whether or not the problems being seen in the various testing labs are in fact causing problems on resident populations and communities in the impacted waters; when completed, this will be one of relatively few studies actually documenting contaminant effects on ecosystems. In other areas where the specific cause of observed problems with various fish species (including the "Threatened" delta smelt) are unknown, we have proposed studies to investigate and confirm an adverse role of contaminants, and to identify the specific contaminant(s) responsible for the problems. These proposed studies, along with others that may be submitted from other sources, are an essential 'first step' in providing the information that is absolutely fundamental for responsible remediation and management. As Sam Luoma has already stated, "Properly focused studies are necessary for cost-effective solutions."

I would also emphasize that the proposed studies are part of a bigger picture. There were several other problem areas identified by the IEP Contaminants group which we felt were important but, in consideration of likely limits on available funding, chose not to promote as part of our immediate agenda. Several of these problems areas, such as selenium contamination and toxicity, were also recognized in the Cal Fed agenda. The breadth of the contaminant-related problems that we suspect may be causing problems on the resources of the estuary is symptomatic of the need for assessment of contaminant impacts at a higher level of organization. This need has also been recognized by the US EPA in their development and promotion of the Risk Assessment process: successful and cost-effective remediation efforts are best directed by a comprehensive assessment and prioritization process. I am 100% convinced that establishing a framework for a more comprehensive assessment of this problem, such as has already been suggested by Bob Spies and Bruce Thompson, is the only way to achieve the type of fix that Cal Fed (and the rest of us) wants. Perhaps we can next best serve the public good by determining how to develop such a framework and comprehensive assessment process. Bob Spies's suggested "elements of a successful restoration program" may be a start in the right direction.

In summary, to proceed with remediation of 'high visibility' contaminants without understanding what the real contaminant problems

in the estuary are could be disastrous. The IEP Contaminants group has identified several "high priority" problems areas, and through a consensus-building process, has developed several proposed studies to address likely contaminant problems of immediate concern. Funding of proposed studies such as these should be a priority of CalFed so that we can subsequently direct remediation efforts to where they will do the most good. In addition, and in recognition that the overall scope of contaminant problems is greater than the problems of immediate concern addressed by our proposed studies, CalFed (and the rest of us) should also initiate a more comprehensive "risk assessment" process so that we may identify and address other contaminant problems that are adversely affecting the estuary's resources. I feel certain that efforts to restore the estuary to some semblance of its former glory will fall flat if studies such as we are proposing along with the implementation of a more comprehensive assessment are not incorporated into Cal Fed's plans. </bigger></bigger></fontfamily>